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June 3, 1993

JUN - 3 1993

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

Ms. Donna R. Searcy, Secretary  
Federal Communications Commission  
Room 222  
1919 M Street, N.W.  
Washington, D.C. 20554

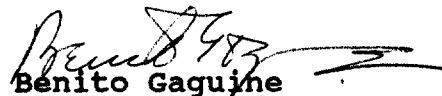
87-268

Dear Ms. Searcy:

There is transmitted herewith on behalf of my client, Isaac Blonder, additional comments filed for consideration in the pending proceedings involving HDTV. Mr. Blonder has submitted comments and reply comments in this proceeding heretofore. In view of the status of the proceeding, the acceptance of the additional comments would appear to be in the public interest.

Should there be any questions concerning this submission, please communicate with the undersigned.

Sincerely,

  
Benito Gaguine

Enclosure

cc: Commissioner James H. Quello  
Commissioner Ervin S. Duggan  
Commissioner Andrew C. Barrett  
Roy J. Stewart, Chief, Mass Media Bureau  
Richard E. Wiley, Esquire

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**ORIGINAL  
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**BEFORE THE  
Federal Communications Commission**

**WASHINGTON, D. C. 20554**

**JUN - 3 1993**

**FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY**

In re Matter of )  
HDTV 3DTV ) **MM Docket # 87-268**  
Third Report and Order )

**To: The Commission**

**FURTHER COMMENTS OF  
BLONDER BROADCASTING COMPANY  
RE FCC ADVISORY COMMITTEE  
ON ADVANCED TELEVISION SERVICES**

The "Grand Alliance" of the HDTV proponents, which desires to merge all of the technologies into a single format, from which the viewer may extract the quality level he can afford, is surely likely to be based upon the submissions on record with the ATTC.

IEEE Transactions on Broadcasting March 1993, included a Special Report on the FCC Advanced Television System Recommendation by the FCC Advisory Committee on Advanced Television service. Finally, the deliberations of the ATTC were codified and exposed to public view.

In the opinion of Mr. Blonder, this Report is seriously flawed, and cannot serve as the basis for the FCC to formulate standards for an Advanced Television Service. Two main defects: the field of Audience Research is totally absent, and the critically important knowledge about terrestrial coverage is both delayed and obsolete.

The report revealed that finances could not be secured for PS/WP7 - Working Party on Audience Research. The title could also have been designated as "Psychophysics". What was suggested for the research topics included, the audiences' willingness to pay a premium for ATV services, types of displays to be used, reaction to a letterbox display, and other consumer interactions to the ATV scene. How can engineers proceed with the design of a new television system without heeding the willingness of the public to pay for the new gadgets? The "Grand Alliance", on C-SPAN, stated confidently that progressive scan and square pixels are needed to

include computer functions and that the customer would pay for the added features. But the audience research on this topic is absent from the ATTC report! My own experience in forty years of manufacturing demonstrated that price is the all important factor in the salability of a product. Fair and honest studies by PS/WP7 are indispensable.

Elsewhere in the ATTC report, the price for a 34-inch ATV receiver was set at \$2500! Were any potential viewers informed that their new ATV TV would cost five times as much as the 27 inch NTSC model and that the height of the picture would be the same 16 inches in both cases? And, that at a viewing distance of 8 feet, human vision could not tell HDTV from NTSC? A side by side comparison of the 16 by 9 ratio PAL screen with the 4 by 3 screen, as I saw a demo in Europe, could kill the market for the higher

The FCC should concentrate on setting a standard for multiple NTSC programs on a single 6 MHz carrier to serve the free Broadcasters with the most economical television service for the entertainment and educational needs of the public.

The Multimedia (computer) industry could always marry their ever-changing products with a standard TV capability, without the blessing of an FCC mandate.

Let the marketplace be the judge!

Respectfully submitted,

BLONDER BROADCASTING COMPANY

By: Isaac S. Blonder  
Isaac S. Blonder

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June 3, 1993